

# Exhibit B

### **DECLARATION OF MYRLANDE ALEXIS**

I, Myrlande Alexis, hereby certify that the following information is true and accurate to the best of my knowledge:

1. My true and complete name is Myrlande Alexis. I am over the age of 18, and I understand the meaning of an oath.
2. I was born in Port-au-Prince, Haiti, on November 5, 1966, but I fled Haiti to come to the United States in 1993. I became a permanent resident of the United States under the Haitian Refugee Immigration Fairness Act, and I later became a naturalized citizen of the United States.
3. My nephew, Garyl Alexis, has lived with me his entire life, since only a few months after his birth, first in Haiti, and then in the United States. His biological mother has not been part of his life since shortly after he was born.
4. Garyl's father, Ferrer Alexis, is my brother, and he is also a U.S. citizen. Ferrer has always lived nearby and participated in Garyl's life, but Garyl lived with me, since we felt that he needed a mother-figure in his life. I have always treated him like my son.
5. I am asking the Court to grant Garyl's applications for relief. Garyl is a good man, and I fear that he will be badly persecuted, and even tortured, if he returns to Haiti.

#### **I flee Haiti to escape persecution for my involvement in the pro-Lavalas TKL party.**

6. In the late 1980s and early 1990s, I was young and political. I was thinking about my future, and the future of my country. All I had know was the government of "Papa Doc" Duvalier, and I just wanted to be able to go to school safely, to sleep safely in my bed, and feel protected in my house. I remember going to bed with my jeans and belt on, just in case anyone came knocking on the door. We all knew that if they knocked on your door, you had to open it up.
7. So I joined the TKL party and the "Lavalas Committee" in my neighborhood and became an active organizer and decision-maker in the party, especially in the run-up to the December 1990 election. At one point, one of Aristide's relatives even stayed in my house for a few weeks while he was trying to hide from the Tonton Macoutes. I participated in protests and had people come to my house to meet about opposing the government and moving my country forward. And during that time, I was beaten up and punched. I had friends who were killed by the government, and other friends who were raped. My cousin Jean-Claude Alexis was disappeared during a protest by men in military uniforms, and we haven't heard from him since.
8. The whole thing took a real toll on me. I was anxious – even suicidal.

9. Then, one day, I was almost raped. It was in the middle of a protest, and I was taken along with a bunch of other women by men wearing military uniforms. They pulled us into a building in the Science Faculty of the university and began to rape the women around me. My clothes had already been ripped off, when out of nowhere, someone started yelling at them to get off of me and leave me alone. It was one of the worst experiences of my life. It's one of the reasons I can't sleep when I go back to Haiti. It's still part of my life.
10. I escaped, but from that point on, I was scared for my life. Worse, I knew it was because of my political activities. I have five sisters, but none of them were political and none of them were targeted. My brother, the only one who was a little political, fled the country as soon as he could. I think he would have been killed if he had stayed.

**The few times I have returned to Haiti, I have carefully protected myself – especially in my recent trips.**

11. Since fleeing Haiti twenty-five years ago, I have only returned a few times. Before the earthquake in 2010, I stayed with my mother in Delmas, where she used to have a house. More recently, though, my mother has left Haiti, and I have nowhere to stay.
12. When I fled Haiti, it was because of the political situation. I had no choice. Now, on top of the political situation, Haiti has become even more violent, poor, and chaotic. The last couple of times I've gone back, I always have to go with the assumption that I might not come back. I leave any valuables here, and I make sure my life insurance policy is up-to-date for my daughters.
13. It sounds dramatic, but it's not. When you're in Haiti, you don't do anything without a purpose. You just get in a car, whose driver you order specifically, and do what you came to do. You don't go out. You don't visit people. Even your own people will send people to rob and kidnap you now. That's the way Haiti is now. The past couple times that I've been there, if I don't take sleeping pills while I'm there, I just won't sleep. The last time my mother was there, she had a blood pressure of 210/111 the whole time, and she had to double her medication and take sleeping pills. Her back was in constant pain from the anxiety. It's that stressful and scary.
14. I have gone back a couple of times since then, most recently in October of 2018, but only with a very specific purpose in mind. At that time, I went to try to arrange an adoption. I stayed for just nine days, and during that whole time we never left the apartment we were staying in – a rental – except when we had to go to the adoption office to meet with the adoption personnel.
15. We had hoped that this was a safer area, but we heard gunshots all night long. We even slept on the floor one night because we were so scared of what was happening outside in the neighborhood. There were protests everywhere, and we had to turn back twice after leaving the apartment because the road was blocked with burning tires. At other times, I



saw groups of people running away from our destination and we had to turn our car around and leave as quickly as possible.

16. Earlier, in 2014, I was in Haiti for three days in order to arrange an earlier adoption for my daughter Destiny Passion Alexis. While we were there, my mother and I were robbed at gunpoint after two men stopped their motorcycles in front of the house where we were staying as we were returning. One pulled out a gun and put it in my back; another one grabbed my mother's neck. They took my purse and phone and told us not to look back. Thinking about it now, it feels like a set up – like the people who had arranged the house let these men know that we were staying there.
17. It's not even like we're rich. But because we were living in the U.S., we were targets.
18. Part of the problem is that people instantly know that I've been living in the U.S. for many years, in spite of the fact that I still speak Haitian Creole fluently. People will say they can see it in your feet – that they're somehow lighter – but I don't know if that's true. I don't really know how they do it, whether it's the way I wear my clothes or how I walk or something else. But it's true – there's no way for me to hide the fact that I've been living in the U.S. for very long.
19. Of course, I'm also concerned that the same people who hated the Lavalas party when I fled Haiti in the '90s will still come after me today if they know I'm back. People can do what they want without any consequences there, and the conflicts from the '90s are still alive today.
20. I still remember that the first time I returned to Haiti, sometime before the earthquake, that people from the opposition party recognized me on the street where my mother lived and pointed at me. Later, they came to the house when I was out and started demanding that I came out. They were yelling about destroying the house and chanting about us being "Lavalas." One of our neighbors fired a gun in the air to get them to go away. I don't know what would have happened otherwise. I think that my mom was okay because she had a good reputation in the community and was always helping everyone. But I wasn't sure what would happen to me. I had been really involved in the party and I was worried that they would come back to hurt me. After that, I never left the house until it was time for me to leave Haiti. I stayed in the house for almost three weeks, just waiting.

**I have always tried to help Garyl with his immigration status.**

21. Since I became a U.S. citizen, I have tried to help Garyl figure out his immigration status. I assisted him in filing applications for Temporary Protected Status and for DACA, and I also helped coordinate the I-130 petition that his father filed for him.
22. Since the time Garyl's I-130 petition was granted and his visa number became current, we have tried to keep in touch with the National Visa Center. However, we have always been worried that Garyl would have to leave the country and return to Haiti in order to

take advantage of his visa, and I was worried about what might happen to him there and how he would get back in to the United States.

23. Then Garyl was arrested and sent to jail in 2017. After that, I didn't think he would be able to take advantage of the visa, and I never responded to the National Visa Center.

**Garyl is a good man and a blessing to his family.**

24. As I explained the letter that I wrote to the court for his first hearing, Garyl has been a true blessing for our family. He has been involved in church throughout his life, first as a member of the youth group and then volunteering to work with the youth in the church by coaching basketball. He has been a mentor for many of his younger cousins and a positive voice of encouragement for them in difficult times.
25. More personally, Garyl has always been my son. I have looked after him since he was a baby, since his mother has not been involved. My brother and I knew that we needed to have a woman's presence in his life, and by the time we were living in the United States, he was already forming connections with my children. Because my brother lived nearby, we thought it would be best to keep him with me. Garyl has always had a good relationship with his father, though, and they have been in constant contact throughout his life.
26. Garyl's impact on my biological children, and on his brothers and sisters, has been really profound. He basically helped to raise my daughter Joanne, doing all of those things that I couldn't always do for her myself. She has told me that she wants Garyl to walk her down the aisle one day when she gets married. Even from jail, Garyl speaks regularly to all of us, and his cousins and siblings still look to him for advice.
27. When I became sick with cancer, Garyl was the person who put aside his own schooling to help take care of me and get me through that difficult time.
28. I don't know whether Garyl did what he was accused of doing, but I know that he really is a good person. Being without status in this country has been very difficult for him at times, but he has always been a wonderful son and brother and nephew and cousin, and a dedicated member of his community.

**Garyl is at great risk of harm if he returns to Haiti.**

29. Traveling in Haiti is risky for anyone, but it is much more dangerous for someone like Garyl, who is easily recognizable as someone from the United States, who doesn't speak the language, and who will be there for a long time with nowhere to stay and no one to trust.



30. Maybe I would be able to hope for some small protection for Garyl if he had any family members or connections in Haiti, but he doesn't. He doesn't have any kind of relationship with his mom. He had a half-aunt living there, but nobody in the family keeps in touch with her. We wouldn't even know how to get in touch with her, and the last we heard, she was living in Chile. We don't trust her anyway. I also have a brother who was deported back to Haiti, but I don't know where he is either. The last I heard was that he was in Santo Domingo. I don't think that he could help Garyl, even if he were in Haiti, when he's just trying to survive himself.
31. Everyone else – any extended family that we know and any friends of ours – are all in the United States. Even as a person who lived there into my adulthood, I don't have any real connections anymore. And in these times, it's hard to be able to trust anyone – even the ones you've known for a long time.
32. So, I don't even know where Garyl would stay if he is returned to Haiti. If the country were not on the brink of disaster, we might thinking of sending my mother back to Haiti to stay with him, but at her age and with her delicate health – high blood pressure and a serious heart condition – she really can't do that.
33. Even worse, I know that Garyl will stick out immediately in Haiti. He looks and acts differently. On top of that, nobody speaks English and Garyl barely understands Creole. He definitely can't speak it. That's dangerous there. Even when I have gone back to Haiti, I never speak English because everyone knows that speaking English makes you a target for kidnapping and robbery. And then, if you don't have anything to give the kidnappers, they will just kill you.
34. After my brother Eddy was deported, people came and robbed my mother's house, where he was staying. It was so bad that my mother had to jump out of a second-story window and couldn't work for a year. I know that, later on, my brother was in hiding for a little while after being threatened with death on several occasions. I don't know the details, but I know that men were looking for him in a black jeep. All of that was when he had a place to live and a person to take care of him. I think this is why he had to leave Haiti – because his connections to the U.S. made him a target.
35. Even if Garyl spoke perfect Creole, like my brother, he would be found out. Haiti is a small place with too little work, and when someone new appears in the neighborhood, people are going to try to find out where you're from and what your story is. There is a tremendous suspicion of newcomers.
36. Then, when anything goes wrong, the people who aren't from Haiti – the ones who don't speak the language or who have an accent or don't understand local culture completely – they're the one's who end up in the middle of anything.
37. Unfortunately, Haiti is still a place where mob violence rules and the police don't do anything. So, with all of the unrest right now, I know that people will look at Garyl and

blame him for what it going wrong. Then there's nothing to stop them from doing whatever they want to him.

38. With all this, I am asking the Court to understand the danger that returning to Haiti puts Garyl in and asking it to let him stay in this country. He is really a good boy. Even if he lost his way for a little while, I know that he will find his way back.

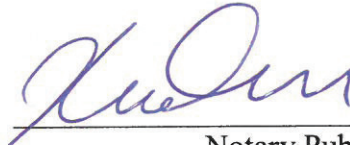
*I swear under penalty of perjury that the following information is true and correct to the best of my knowledge.*

Date: 9/12/19

Signature: Myrlande Alexis

Subscribed and sworn to before me this 12 day of September, 2019, by

Myrlande Alexis

  
\_\_\_\_\_  
Notary Public

My commission expires: \_\_\_\_\_ My Commission Expires Sept. 30, 2019



12/22/2018

To whom may this concern

I am Myrlande Alexis, Garyl's aunt who raised him. Garyl has been living in this country since he was four years old. Before that he was leaving in Haiti with my mom and I since he was four months old and he doesn't know his mom. He grew up as the sweetest boy you could ever know, and my two daughters, who grew up with Garyl, always called him a "mama's boy". Garyl has become a caring, respectful young man, full of charisma. He loves kids, he loves drawing, he loves sports (more specifically has a passion for basketball), he loves to go to the gym, he's funny, and he's someone who's not afraid to apologize if he did something wrong. He has coached many kids in basketball, volunteering at camps, at church and other places. He was baptized at a very young age, participating in the choir and youth group at church; he was even the coach for the church basketball team. Many times, I had random parents, black and white, that came to my house or saw me on the street and stopped me to thank me, telling me how Garyl has helped them with their kids, some of those kids sometimes were even older than Garyl, that were misbehaving. Garyl has helped me raise my youngest daughter who's now graduated at Boston University majoring in Human Physiology and planning to go to medical school this fall. When my daughter was growing up, from her adolescence until before Garyl got locked up, anytime I tried to talk to her about anything like boys, friends or any other things, she'd say "Mom, Gary already told me" and Garyl would say "Mom I told I got Jo". Garyl has three younger brothers and a younger sister that is in the navy, all of whom he also looked after growing up. All of his siblings were born here in the US. Anyone who knows Garyl would not believe that he's in that situation; I could have had many people write letters for Garyl, but I believe in family values, and I am still trying to restore and protect Garyl's dignity. So, our kids decided to write letters and to support him, since no one knows Garyl better than them. Garyl loves school; he wanted to play college basketball but he couldn't go to college because of his immigration status. When that didn't happen, he wanted to go to school for physical therapy with a dream to become a sports therapist. He did a few semesters at gateway community college, but again he couldn't go far with it. He had to stop because I was paying for him and I couldn't pay anymore, since things got a little rough on me due to my health issues. I'm a nurse but I can't work the same way I used to anymore. I was diagnosed with massive breast cancer and went through strong chemo and radiation treatments which limited my strength to work like I used to. Ever since I had cancer, not one year has passed without me having a surgery or a biopsy, in February and March 2015 just before this thing happened I had two major surgeries back to back and it was Garyl who was at home with me, helping me eat and taking me to my follow up doctor's appointments. After this incident happened, in a conversation with Garyl, I asked about his old friends from school and basketball because Garyl used to live on the basketball court and in the gym with his friends. He told me "I was getting teased by many of them at the basketball court, telling me I don't have a life because I'm not working and not in school. Some of them even tried to get in a fight with me". That day I cried so much because I didn't know he was going through that. Garyl has struggled with his immigration status for years. I have 27 blood-related nephews and nieces plus my biological daughter and my two adopted daughters and all of them are very close. We used to have family gatherings very often and our family values are the number one priority, but since Garyl has been away in that situation is like a part of the family is buried we don't have family gathering specially those gathering were most of the time at my

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house. Our family value education for all of our kids, some of whom have already finished high school, gone through 4 years of college and graduated, and are now working with good jobs; a few of them are still in college. We want the same path for Garyl. If I could describe him best, I'd say he is a leader, a coach and a mentor for our kids and many other people's kids. He's caring, respectful, funny and full of charisma, but unfortunately he has made a mistake that I'm pretty sure, after this lessons while locked up he's ready to face life and make a difference of his choices. Sending Garyl to Haiti will destroy his life physically, mentally even can cause him to lose his life due to the ongoing all the problems that has be going on in Haiti. What's going on in Haiti now is not a joke its serious life threatening situation that my daughter and I Just witness in a trip for an adoption specially we don't have a house anymore since after the Earthquake. Myself I was a victim of violence in Haiti before I came to live in US and in 2014 went that was the time I decided not to go to Haiti anymore, the only reason my daughter and I went is for my adoption because it is too risky, really it was not a joke. And also as a nurse I'll go help anywhere that have a disaster. As a mother and as a cancer survivor, God has given me many chances in my life. So, I'm writing this letter to ask that you please when making a decision in Garyl case to think about a second chance and give Garyl a second chance so he can be the bright young man that God created him to be. I believe that sometimes God takes us to our last breath so he can bring us back to life; I'm a living testimony of this being that I had six miscarriages and God gave me one beautiful biological daughter, two adopted daughters, and my only son Garyl, and he also kept me from dying from cancer. Our family and the church act as a very strong support system in place to support Garyl to help him go through all of it, and we have a plan to get him back to school and for him to continue to be the leader and the mentor that I know he is.

Sincerely,  
Myrlande Alexis LPN  
Norwalk Community College  
2036907018

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